



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUN 3 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Colleen Mahoney
Delaware Petroleum, Inc.
P.O. Box 608
Claymont, DE 19703

Dear Ms. Mahoney:

Region III of the United States Environmental Protection Agency (EPA) has conducted a review of our Resource Conservation and Recovery Act (RCRA) and National Pollutant Discharge Elimination System (NPDES) files for your facility located in the State of Delaware which was purchased from Texaco Refining and Marketing Inc. As a result of this review, EPA has concluded that some additional information is required to determine the status of this facility as a generator, treater, storer, or disposer of hazardous waste.

Pursuant to the provisions of RCRA, 42 U.S.C. §§ 6901 et seq, the Administrator of the EPA authorized the State of Delaware on June 22, 1984 to carry out portions of a hazardous waste program. The Delaware regulations, 7 Delaware Code Chapter 63, through this authorization became requirements of the EPA program of Subtitle C of RCRA.

In order to determine the status of the above-referenced facility, we hereby request, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927, that you furnish to EPA, within 14 calendar days of receipt of this letter, the following information:

1. Identify all solid wastes generated by the above-referenced facility since November 19, 1980.
2. Provide copies of the hazardous waste determinations made concerning the solid wastes, described in response to paragraph 1, as required by 40 C.F.R. § 262.11 and the equivalent State of Delaware regulation § 262.11. Provide a description of the hazardous waste determinations made for those solid wastes for which copies are not available.

3. Describe the methods of onsite and offsite treatment, storage and disposal for each solid waste identified in response to paragraph 1. For all onsite treatment units provide a name and brief description, including construction design, materials used in construction and dimensions.

If some or all of the above requested information has been previously submitted to this office, please reference this information in your reply.

Failure to provide information requested pursuant to Section 3007 of RCRA constitutes a violation of RCRA. Section 3008 of RCRA, 42 U.S.C. § 6928, provides EPA with the authority to apply administrative, civil, and criminal sanctions for violations of RCRA.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

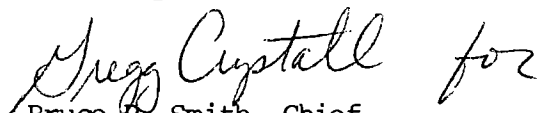
This collection of information request is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Please send the requested information to:

U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107
Attn: John Nevius (3HW15)

If you have any questions concerning this matter, please contact Mr. John Nevius at (215) 597-2381.

Sincerely,

 for
Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch

cc: Paul Jones, Delaware Department of Natural
Resources & Environmental Control

DELAWARE
PETROLEUM, INC.



P.O. BOX 608, CLAYMONT, DELAWARE 19703
(302) 792-7727

6/15/88

Mr. John Nevins (3HW15)
U.S. E.P.A.
Region 3
841 Chester Bldg.
Phila., Pa. 19107

Dear Mr. Nevins;

In response to your request of 6/3/88, I have compiled all available information to the best of my ability.

Since September of 1986, at which time Delaware Petroleum began occupying this property, there have been no solid waste of any type generated, treated, stored, or disposed of. Since that time, we have stored only home heating oil in quantities of 50,000 bbls at any given time.

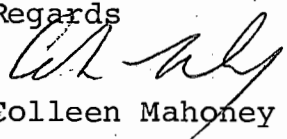
The only waste, other than household, is rainwater and storm drain runoff which is monitored via a gravity operated separator, NPDES permit # DE 0000663.

This facility was inspected on 2/23/88 by an officer of the Department of Natural Resources and Environmental Control, of which a copy is enclosed. All violations were corrected immediately.

It is our intention, to decrease and eventually phase out all liquid handling operations on these premises.

I hope you find all in order.

Regards


Colleen Mahoney



United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code 1M 25 NPDES 3DE0000663 11 yr/mo/day 12880223 17 Inspection Type 18C Inspector 19S Fac Type 202

Remarks

21 Reserved 67 68 69 Facility Evaluation Rating 70 71 72 73 74 75 76 77 78 79 80

Section B: Facility Data

Name and Location of Facility Inspected <u>Delaware Petroleum Corp.</u> <u>6200 Phila. Pike</u> <u>Claymont Dela. 19708</u>		Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM <u>8:20</u>	Permit Effective Date <u>11/8/84</u>
		Exit Time/Date	Permit Expiration Date <u>11/7/89</u>
Name(s) of On-Site Representative(s) <u>Coleen Mahoney</u>		Title(s) <u>OPERATIONS MANAGER</u>	Phone No(s) <u>792-7727</u>
Name, Address of Responsible Official <u>SAME</u>		Title	
		Phone No.	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<u>U</u>	Permit	<u>U</u>	Flow Measurement	<u>N/A</u>	Pretreatment	<u>S</u>	Operations & Maintenance
<u>U</u>	Records/Reports	<u>U</u>	Laboratory	<u>N/A</u>	Compliance Schedules	<u>N/A</u>	Sludge Disposal
<u>S</u>	Facility Site Review	<u>N</u>	Effluent/Receiving Waters	<u>U</u>	Self-Monitoring Program		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Name(s) and Signature(s) of Inspector(s) <u>J. Mulroony</u>	Agency/Office/Telephone <u>DNREC 736-5711</u>	Date <u>2-23-88</u>
Signature of Reviewer <u>Joe Kelly</u>	Agency/Office <u>DNREC</u>	Date <u>3/3/88</u>
Regulatory Office Use Only		
Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance

ions F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.

DE 0060663

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY
(Including City, County and ZIP code)

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE

FINDINGS

NONE

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

☐ YES☒ NO☐ N/A (Further explanation attached _____)

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION

☐ YES☒ NO☐ N/A

(ii) ANALYSES DATES, TIMES

☒ YES☐ NO☐ N/A

(iii) INDIVIDUAL PERFORMING ANALYSIS

☒ YES☐ NO☐ N/A

(iv) ANALYTICAL METHODS/TECHNIQUES USED

☐ YES☒ NO☐ N/A

(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data) (Flow vs Load)

☐ YES☒ NO☐ N/A

(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records).

☒ YES☐ NO☐ N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.

☐ YES☐ NO☒ N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.

☒ YES☐ NO☐ N/A

(e) QUALITY ASSURANCE RECORDS KEPT.

☐ YES☒ NO☐ N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.

☐ YES☐ NO☒ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT.

☐ YES☒ NO☐ N/A (Further explanation attached _____)

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.

☒ YES☐ NO☐ N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT. STORMWATER ONLY; SALT PILE RUNOFF

☐ YES☒ NO☐ N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.

☒ YES☐ NO☐ N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.

☒ YES☐ NO☐ N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES. 9/87

☒ YES☐ NO☐ N/A

(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.

☐ YES☐ NO☒ N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.

☒ YES☐ NO☐ N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.

☒ YES☐ NO☐ N/A

(i) ALL DISCHARGES ARE PERMITTED.

☒ YES☐ NO☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

☒ YES☐ NO☐ N/A (Further explanation attached _____)

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. AUX GENERATOR

☒ YES☐ NO☐ N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☒ YES☐ NO☐ N/A

(c) REPORTS ON/ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.

☐ YES☐ NO☒ N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.

☐ YES☐ NO☒ N/A

(e) ALL TREATMENT UNITS IN SERVICE.

☒ YES☐ NO☐ N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. Hudson Engineering

☒ YES☐ NO☐ N/A

(g) QUALIFIED OPERATING STAFF PROVIDED. (Facility NR)

☒ YES☐ NO☒ N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.

☒ YES☐ NO☐ N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.

☒ YES☐ NO☐ N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.

☒ YES☐ NO☐ N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.

☒ YES☐ NO☐ N/A

(l) SPCC PLAN AVAILABLE. Received Sept. 1986

☒ YES☐ NO☐ N/A

(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates _____)

☐ YES☐ NO☒ N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION. (Not possible)

☐ YES☐ NO☒ N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.

☐ YES☒ NO☐ N/A

PERMIT NO.

DE 0000663

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.

☐ YES ☐ NO ☒ N/A (Further explanation attached _____)

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 - Flow measurement (Further explanation attached _____)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.

☐ YES ☒ NO ☐ N/A

DETAILS:

- (a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. Stevens Meter - Float ☒ YES ☐ NO ☐ N/A
- TYPE OF DEVICE: ☒ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER (Specify _____)
- (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 9/81) ☐ YES ☒ NO ☐ N/A
- (c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED. ☒ YES ☐ NO ☐ N/A
- (d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED. ☒ YES ☐ NO ☐ N/A
- (e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES. ☒ YES ☐ NO ☐ N/A

Part 2 - Sampling (Further explanation attached _____)

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.

☐ YES ☒ NO ☐ N/A

DETAILS:

- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. ☒ YES ☐ NO ☐ N/A
- (b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT. ☒ YES ☐ NO ☐ N/A
- (c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. ☒ YES ☐ NO ☐ N/A
- IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY _____
- (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE. ☐ YES ☒ NO ☐ N/A
- (i) SAMPLES REFRIGERATED DURING COMPOSITING ☐ YES ☒ NO ☐ N/A
- (ii) PROPER PRESERVATION TECHNIQUES USED ☒ YES ☐ NO ☐ N/A
- (iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT ☐ YES ☐ NO ☒ N/A
- (iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3 ☒ YES ☒ NO ☐ N/A
- (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT. ☐ YES ☒ NO ☐ N/A
- (f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT. ☐ YES ☐ NO ☒ N/A

Part 3 - Laboratory (Further explanation attached _____)

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.

☐ YES ☒ NO ☐ N/A

DETAILS:

- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3) ☒ YES ☐ NO ☐ N/A
- (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. ☐ YES ☐ NO ☒ N/A
- (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. ☐ YES ☒ NO ☐ N/A
- (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ YES ☐ NO ☐ N/A
- (e) QUALITY CONTROL PROCEDURES USED. ☒ YES ☐ NO ☐ N/A
- (f) DUPLICATE SAMPLES ARE ANALYZED. _____ % OF TIME. ☐ YES ☒ NO ☐ N/A
- (g) SPIKED SAMPLES ARE USED. _____ % OF TIME. ☐ YES ☐ NO ☒ N/A
- (h) COMMERCIAL LABORATORY USED. ☒ YES ☐ NO ☐ N/A
- (i) COMMERCIAL LABORATORY STATE CERTIFIED. ☐ YES ☐ NO ☒ N/A

LAB NAME

Cooperative Ventures

LAB ADDRESS

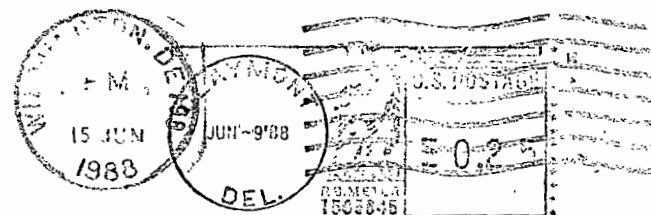
Beddons Village Suite 3A
Newark DE 19101

(Record of item checked above)	
TO: Colleen Mahoney Del. Petroleum Claymont DE	FROM: John Nevius RCRA erf
DATE 6/20/88 TIME 8:50	
SUBJECT: RCRA/NPDES surface impoundments	
SUMMARY OF COMMUNICATION <p>Having reviewed the 6/15/88 submittal which responded to the 3007 request for information (6/3/88) sent to Del. Petroleum I had determined that the following information is required:</p> <ul style="list-style-type: none"> map showing location const. specs. - for separator/impoundment date built materials used (? liner) specifications - size etc. definitive statement no h.w. is entering process info oil water separator? where does oil go? ? is done re: sludge? " " water go? build up in the pond certification of closure and sludge removal when the property was transferred from Texa The most recent effluent sampling results including QA - analytical meth flow quantities holding time refrigeration 	
CONCLUSIONS, ACTION TAKEN OR REQUIRED <p>Ms. Mahoney will send me a letter responding to all of the questions listed above ASAP</p>	
INFORMATION COPIES TO: File	

DELAWARE
PETROLEUM, INC.



P.O. BOX 608, CLAYMONT, DELAWARE 19703



Mr. John Nevins (3HW15)
U.S. E.P.A.
Region 3
841 Chester Bldg.
Phila., Pa. 19107